22

23

24

25

26

27

28

	ANTHONY L. MARTIN, ESQ.			
1	Nevada Bar No. 8177			
2	anthony.martin@ogletreedeakins.com			
	JILL GARCIA, ESQ.			
3	Nevada Bar No. 7805			
4	jill.garcia@ogletreedeakins.com			
4	JAMES BERCHTOLD, ESQ.			
5	Nevada Bar No. 5874			
	jim.berchtold@ogletreedeakins.com	D.C		
6	OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C. Wells Fargo Tower			
7	Suite 1500			
,	3800 Howard Hughes Parkway			
8	Las Vegas, NV 89169			
9	Telephone: 702.369.6800			
9	Fax: 702.369.6888			
10				
	Attorneys for Defendants Eldorado Resorts Corporation			
11	and Michael Marrs			
12				
	UNITED STATES DISTRICT COURT			
13				
14	FOR THE DISTR	RICT OF NEVADA		
14	MARCELLA PARR,	Case No.: 2:15-cv		
15	MARCELLA I ARK,	Case 110 2.13-cv		
	Plaintiff,			
16	,	STIPULATIO		
17	VS.	EXTEND TIME		
	EV DOD A DO DEGODEG GODDOD A EVON	MOTIONS AN		
18	ELDORADO RESORTS CORPORATION, a	REPLI		
19	Florida corporation; MICHAEL MARRS;			
19	BRUCE POLANSKY; KRISTEN BECK; DOMINIC TALEGHANI; JAMES	(FIRS		
20	GRIMES; AND DOES 1-50, inclusive;	(LIK)		
	OKHVIES, AND DOES 1-30, HICIUSIVE,			
21				

Defendants.

STIPULATION AND ORDER TO EXTEND TIME TO FILE DISPOSITIVE

Case No.: 2:15-cv-01030-RFB-PAL

MOTIONS AND RESPONSES AND REPLIES THERETO

(FIRST REQUEST)

Pursuant to LR IA 6-1, LR IA 6-2, LR 7-1 and LR 26-4, Plaintiff Marcella Parr ("Plaintiff") and Defendants Eldorado Resorts Corporation and Michael Marrs (collectively, "Defendants"), by and through their undersigned counsel, hereby stipulate and agree to this first request for extension of time for the parties to file dispositive motions in this action, along with related responses and replies. Pursuant to the Court's September 22, 2016, Order for Extension of

18

19

20

21

23

24

25

26

27

28

1

2

3

4

5

6

7

8

9

10

Discovery Deadlines (ECF No. 44), the current deadline for filing dispositive motions in this case is January 30, 2017, (see id. at 8). The parties have completed all discovery in this matter, and good cause exists for the proposed extension based upon the following:

As the Court is aware, this case is one of thirty-three related lawsuits sitting before this Court. Recognizing the complexity of litigating these lawsuits simultaneously, the parties agreed to divide the cases into five groups and stagger deadlines in order to streamline the litigation process and avoid overlapping dispositive motion deadlines. Defendants' filed Motions for Summary Judgment on September 1, 2016 and September 15, 2016, in Group II cases. Unfortunately, response and reply briefing has been delayed and will not be completed before the deadline for filing dispositive motions in this case.¹

Based upon the foregoing, the parties have agreed that the dispositive motion deadlines should be extended by forty-five (45) days in the following manner:

- Defendants shall file their dispositive motions no later than March 16, 2017;
- Plaintiff shall file any response to Defendants' dispositive motions no later than April 17, 2017 (30th day is Saturday, April 15, 2017);
- Defendants shall file their reply no later than May 17, 2017.

¹ This request for additional time is also addressed in Defendants' Limited Response to Plaintiff's Motion for an Extension of Time.

Case 2:15-cv-01030-RFB-PAL Document 50 Filed 12/28/16 Page 3 of 3

	1	This stipulation is not brought for	purposes of delay or any other improper purpose.	
	2	Dated this 20th day of December 2016		
	3	WATKINS & LETOFSKY, LLP	OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.	
TELEPHONE: 702.369.6800	4		a siewint, i.e.	
	5	/s/ Daniel R. Watkins	/s/ Anthony L. Martin	
		Daniel R. Watkins Brian S. Letofsky	Anthony L. Martin Jill Garcia	
	6	8215 South Eastern Avenue	Jim Berchtold	
	7	Suite 280	3800 Howard Hughes Parkway	
	8	Las Vegas, NV 89123	Suite 1500	
		Attornoys for Plaintiff Margalla Parr	Las Vegas, NV 89169	
	9 10	Attorneys for Plaintiff Marcella Parr	Attorneys for Defendants Eldorado Resorts Corporation and Michael Marrs	
			corporation with a received a received	
	11		<u>ORDER</u>	
	12			
	13	IT IS SO ORDERED.		
	14		Jeggy a. Jeen	
	15		UNITED STATES MAGISTRATE JUDGE	
	16		December 28, 2016	
			DATED	
	17			
	18			
	19			
	20			
	21			
	22			
	23			
	24			
	25			
	26			
	27			
	28			